

**HEARING DATE: November 29, 2007
AT: 10:00 A.M.**

**OBJECTIONS DUE: November 21, 2007
AT: 10:00 A.M.**

TOGUT, SEGAL & SEGAL LLP
Conflicts Counsel for Delphi Corporation, *et al.*,
Debtors and Debtors-in-Possession
One Penn Plaza, Suite 3335
New York, New York 10119
(212) 594-5000
Albert Togut (AT-9759)
Neil Berger (NB-3599)
Sean P. McGrath (SM-4676)

Delphi Legal Information Hotline:
Toll Free: (800) 718-5305
International: (248) 813-2689

Delphi Legal Information Website:
<http://www.delphidocket.com>

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
In re:	:
	:
DELPHI CORPORATION <i>et al.</i> ,	:
	:
Debtors.	:
-----X	

Chapter 11
Case No. 05-44481 (RDD)
Jointly Administered

**NOTICE OF DEBTORS' MOTION FOR AN ORDER
GRANTING DEFAULT JUDGMENT AGAINST FURUKAWA
ELECTRIC NORTH AMERICA APD AND FURUKAWA ELECTRIC CO., LTD.**

PLEASE TAKE NOTICE that upon the annexed Declaration, Delphi Corporation ("Delphi") and certain of its subsidiaries and affiliates, Debtors and Debtors-in-Possession in the above-captioned cases ("Debtors"), by their Bankruptcy conflicts counsel, Togut, Segal & Segal LLP, will move before the Honorable Robert D. Drain, United States Bankruptcy Judge, in Courtroom 610 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on November 29, 2007 at 10:00 a.m. or as soon thereafter as

counsel may be heard (the "Hearing Date") for an Order Granting Default Judgment against Furukawa Electric North America APD and Furukawa Electric Co., Ltd.

PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to this Motion (a) must be in writing, (b) must conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and the Order under 11 U.S.C. §§ 102 (1) and 105 and Fed. R. Bankr. P. 2002(m), 9006, 9007, and 9014 Establishing (i) Omnibus Hearing Dates, (ii) Certain Notice, Case Management, and Administrative Procedures, and (iii) Scheduling an Initial Case Conference in Accordance with Local Bankr. R. 1007-2(e) (the "Case Management Order") (Docket No. 245), (c) must be filed with the Bankruptcy Court in accordance with General Order M-242 (as amended) - registered users of the Bankruptcy Court's case filing system must file electronically, and all other parties-in-interest must file on a 3.5 inch disk (preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format), (d) must be submitted in hard-copy form directly to the chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, and (e) and must be served upon: (i) Delphi Corporation, 5725 Delphi Drive, Troy, Michigan 48098 (Attn: General Counsel); (ii) conflicts counsel for the Debtors, Togut, Segal & Segal LLP, One Penn Plaza, New York, New York 10119 (Attn: Neil Berger, Esq.); and (iii) counsel for the Official Committee of Unsecured Creditors, Latham Watkins, LLP, 885 Third Avenue, Suite 1000, New York, New York 10022 (Attn: Robert J. Rosenberg, Esq.) in each case so as to be filed and received no later than 10:00 a.m. (Prevailing Eastern Time) on November 21, 2007 (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that only those timely-written objections made in accordance herewith, and timely filed and received by the Objection Deadline

will be considered by the Bankruptcy Court, and that if no objections to the Order are timely filed and served, the Bankruptcy Court may enter the Order.

Dated: New York, New York
October 24, 2007

TOGUT, SEGAL & SEGAL LLP
Bankruptcy Conflicts Counsel for
Delphi Corporation, *et al.*,
Debtors and Debtors-in-Possession
By:

/s/ Neil Berger
NEIL BERGER (NB-3599)
A Member of the Firm
One Penn Plaza, Suite 3335
New York, New York 10119
Telephone: (212) 594-5000
Facsimile: (212) 967-4258